

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-CR-20341-ALTMAN(s)**

**UNITED STATES OF AMERICA**

**vs.**

**ROLANDO RAMIREZ,  
RASHEED ALI, a/k/a “Fresh,”  
TAMRAT SHIFTA MASON, a/k/a “Shifta,”**

**Defendants.**

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**GOVERNMENT’S AMENDED WITNESS AND EXHIBIT LIST**

The Government, by and through the undersigned Assistant United States Attorney, respectfully submits the following list of witnesses and exhibits as it relates to the trial in the above- styled action.

The Government requests leave to add exhibits as they may become necessary during the trial in this matter.

Respectfully submitted,

HAYDEN P. O’BYRNE  
UNITED STATES ATTORNEY

By: /s/ Abbie D. Waxman

Abbie D. Waxman  
Assistant United States Attorney  
Florida Bar No.: 109315  
99 N.E. 4th Street  
Miami, FL 33132-2111  
Tel: 305-961-9240  
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|   |          |              |                  |         |  |  |
|---|----------|--------------|------------------|---------|--|--|
| Presiding Judge:<br>The Honorable Roy K. Altman |          |              |                  |         | AUSAs:<br>Abbie D. Waxman and<br>Michael Gilfarb | Defendants' Attorneys:<br>Philip Reizenstein<br>Eric Schwartzreich<br>Richard Merlino<br>Dustin Tischler |
| USA No.   | Def. No. | Date Offered | Date<br>admitted | Witness | Court Reporter:<br>Francine Salopek              | Courtroom Deputy:<br>Janier Arellano   |
| <b>WITNESSES:</b>                               |          |              |                  |         |  |  |
| 1.  |          |              |                  |         | Alex Vega  |  |
| 2.  |          |              |                  |         | Ryan Dreibelbis, FBI                             |  |
| 3.  |          |              |                  |         | Aymara Vega                                      |  |
| 4.  |          |              |                  |         | Adriel Vega                                      |  |
| 5.  |          |              |                  |         | Yvonne Garcia, MDPD (Retired)                    |  |
| 6.  |          |              |                  |         | Jose Llerena                                     |  |
| 7.  |          |              |                  |         | Jaime Serrano                                    |  |
| 8.  |          |              |                  |         | Lianko Ramirez                                   |  |
| 9.  |          |              |                  |         | Edwin Carias                                     |  |
| 10.   |          |              |                  |         | Juan Lombana                                     |  |
| 11.   |          |              |                  |         | Julio Betancourt, MDPD                           |  |
| 12.   |          |              |                  |         | Jaime Bethel, MDPD                               |  |
| 13.   |          |              |                  |         | David Hardin, GCSO                               |  |
| 14.   |          |              |                  |         | Timothy "Judah" Pent, FBI                        |  |
| 15.   |          |              |                  |         | Marcos Jimenez                                   |  |
| 16.   |          |              |                  |         | Michael Baez                                     |  |
| 17.   |          |              |                  |         | Alexei Berbick                                   |  |
| 18.   |          |              |                  |         | Larry Hendricks, MDPD                            |  |
| 19.   |          |              |                  |         | Hector Garcia-Balbin, MDPD                       |  |
| 20.   |          |              |                  |         | Jared Jukel                                      |  |
| 21.   |          |              |                  |         | Oscar Ali  |  |

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| 22.   |          |              |               |         | Frank Gil  |  |
| 23.   |          |              |               |         | Dr. Naaman Abdullah                              |  |
| 24.   |          |              |               |         | David Bernreuther                                |  |
| 25.   |          |              |               |         | Juan Ramirez                                     |  |
| 26.   |          |              |               |         | Julian Flores                                    |  |
| 27.   |          |              |               |         | Freddy Pena                                      |  |
| 28.   |          |              |               |         | Alex Reyes                                       |  |
| 29.   |          |              |               |         | Garrett Hellman                                  |  |
| 30.   |          |              |               |         | Cindy Barrois, FBI                               |  |
| 31.   |          |              |               |         | Gregory Hoffman, FBI                             |  |
| 32.   |          |              |               |         | Sara Rios-Ordonez                                |  |
| 33.   |          |              |               |         | Asia Lister                                      |  |
| 34.   |          |              |               |         | Alexya Chapoteau                                 |  |
| 35.   |          |              |               |         | Angel Febres                                     |  |
| 36.   |          |              |               |         | Dore Chaponik                                    |  |
| 37.   |          |              |               |         | Derrick Enriquez                                 |  |
| 38.   |          |              |               |         | Carlos Perez                                     |  |
| 39.   |          |              |               |         | Alex Muniz                                       |  |
| 40.   |          |              |               |         | Brendan Acquaviva, FBI                           |  |
| 41.   |          |              |               |         | Yalene Marissa Gonzalez                          |  |
| 42.   |          |              |               |         | Manuel Hernandez                                 |  |
|   |          |              |               |         |  |  |

|   |          |              |                  |         |   |  |
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| <b>EXHIBITS:</b>                                |          |              |                  |         |   |  |
| 1.<br>1a.                                       |          |              |                  |         | Residential (1 Vega) 10620 SW 118 Avenue, Miami<br>Shortened Clip   |  |
| 2.<br>2a.<br>2b.<br>2c.                         |          |              |                  |         | Residential (2 Vega) 10620 SW 118 Avenue, Miami<br>Shortened Clip<br>Photo Still of Shooter in Mask<br>Photo Still of Shooter in Gloves                         |  |
| 3.<br>3a.<br>3b.<br>3c.                         |          |              |                  |         | Residential 1 - 11756 S.W. 106 Terrace, Miami<br>Shortened Clip 1<br>Shortened Clip 2<br>Location and Directional Map   |  |
| 4.<br>4a.<br>4b.<br>4c.                         |          |              |                  |         | Residential 1 - 11756 S.W. 106 Terrace, Miami<br>Shortened Clip 1<br>Shortened Clip 2<br>Location and Directional Map   |  |
| 5.<br>5a.<br>5b.<br>5c.<br>5d.<br>5e.           |          |              |                  |         | Residential (Park) – 11731 S.W. 108 Lane, Miami<br>Shortened Clip 1<br>Shortened Clip 2<br>Shortened Clip 3<br>Shortened Clip 4<br>Location and Directional Map |  |
| 6.<br>6a.                                       |          |              |                  |         | Residential 1 11702 S.W. 106 Terrace, Miami<br>Location and Directional Map   |  |
| 7.<br>7a.                                       |          |              |                  |         | Residential 2 11702 S.W. 106 Terrace, Miami<br>Location and Directional Map   |  |
| 8.  |          |              |                  |         | Commercial/Plaza Corner/ 117 Avenue, Miami<br>Business Record Certification (Sp)  |  |

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| 8a.<br>8b.<br>8c.  |          |              |               |         | Business Record Certification (Trans.)<br>Location and directional map   |  |
| 9.   |          |              |               |         | Sunpass Certification and Images   |  |
| 10a.<br>10b.<br>10c.<br>10d.<br>10e.<br>10f.<br>10g.<br>10h.<br>10i.<br>10j. |          |              |               |         | Enterprise Rental Video (Versa)<br>Photo still of Nissan Versa<br>Enterprise Rental Video (Rogue)<br>Photo still of Nissan Rogue<br>Photo still of Nissan Rogue 2<br>Enterprise Counter Video<br>Photo still of Enterprise counter<br>Photo still garage 1<br>Photo still garage 2<br>Photo still garage 3 |  |
| 11.  |          |              |               |         | FBI drive to Doral Collision   |  |
| 12.  |          |              |               |         | Julian Jimenez   |  |
| 13a.-p.  |          |              |               |         | ALI residence (Search Warrant March 2023)  |  |
| 14a.-o.<br>14p.-s.   |          |              |               |         | ALI residence (Search Warrant August 2024)<br>Burner Phones Recovered  |  |
| 15.  |          |              |               |         | Impala Title   |  |
| 16a.-b.  |          |              |               |         | Juan Ramirez a/k/a "Shampoo" Phone Extraction<br>Chat<br>Transfers   |  |
| 17a.<br>17b.   |          |              |               |         | Lightened Image<br>Recording making lightened image  |  |
| 18.  |          |              |               |         | Firearm DNA Swabs  |  |
| 19.  |          |              |               |         | Juan "Shampoo" Ramirez   |  |

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| 20a.-e.   |          |              |               |         | Typhani ALI Residence (Consent Search August 2024)  |  |
| 21a.-e.   |          |              |               |         | Mari Oba Photographs  |  |
| 22a.-g.   |          |              |               |         | Juan Ramirez CashApp Photographs  |  |
| 23a.-e.   |          |              |               |         | ALI Layne Boulevard (Consent Search August 2024)  |  |
| 24a.-c.   |          |              |               |         | Timeless Cannabis Instagram   |  |
| 25.   |          |              |               |         | MASON Facebook photographs  |  |
| 26a.-i.   |          |              |               |         | FDC Miami visitation area   |  |
| 27.<br>27a.-f.                                  |          |              |               |         | Shirt<br>Photographs of shirt in vehicle  |  |
| 28.<br>28a.-e.                                  |          |              |               |         | Ballistics/ Projectiles (2) / Body of Alex Vega<br>Photographs                                    |  |
| 29.<br>29a.-g                                   |          |              |               |         | Ballistic/ Casings (5) / Residence<br>Photographs   |  |
| 30.   |          |              |               |         | Ballistic/ Casing (1)/ Residence  |  |
| 31.<br>31a.-h.                                  |          |              |               |         | Ballistic/ Projectiles (2) / Fragment (1) Vehicle<br>Photographs                                  |  |
| 32.<br>32a.                                     |          |              |               |         | Ballistic/ Projectile and Fragments (Driver's<br>Seat), Projectile (shoe box trunk)<br>Photograph |  |
| 33.<br>33a.-g.                                  |          |              |               |         | Mask<br>Photographs from scene  |  |
| 34.<br>34a.-e.                                  |          |              |               |         | Gloves<br>Photographs from scene  |  |
| 35a.<br>35b.-m.                                 |          |              |               |         | Ballistics/ Firearm, Magazine, Test Fires<br>Photographs  |  |

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| 36.<br>36a.  |          |              |               |         | Aerial Image<br>Aerial Image with Evidence Locations   |  |
| 37.<br>37a.  |          |              |               |         | Jimenez Swab<br>Jimenez Photograph   |  |
| 38.  |          |              |               |         | Unfired cartridges   |  |
| 39a.<br>39b.<br>39c.<br>39d.<br>39e.<br>39f.<br>39g.<br>39h.<br>39i.<br>39j. |          |              |               |         | Westchester County Jail 8/11/22<br><br>Transcript<br>Westchester County Jail 8/13/22<br><br>Transcript<br>Westchester County Jail 8/23/22<br><br>Transcript<br>Federal Detention Center – Miami 10/6/23<br><br>Transcript<br>Federal Detention Center – Miami 10/14/23<br><br>Transcript |  |
| 40a.<br>40b.   |          |              |               |         | ALI FBI Interview Audio<br>Transcript  |  |
| 41a.-d.  |          |              |               |         | MASON FBI interview 1 (November 29, 2022)<br>Transcript<br>MASON FBI interview 2 (November 29, 2022)<br>Transcript   |  |
| 42a.-h.  |          |              |               |         | Mason FBI Interview (August 18, 2022)<br>Transcript<br>Mason FBI Interview (October 24, 2022)<br>Transcript<br>Mason FBI Interview Part 1 (November 18, 2022)<br>Transcript<br>Mason FBI Interview Part 2 (November 18, 2022)  |  |

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|   |          |              |               |         | Transcript   |  |
| 43a.-s.   |          |              |               |         | RAMIREZ Jail Calls<br>Transcripts  |  |
| 44a.<br>44b.                                    |          |              |               |         | Stephan Adams Jail Call to ALI<br>Transcript   |  |
| 45a.<br>45b.                                    |          |              |               |         | FDC Miami Consent Recording<br>Transcript  |  |
| 46.   |          |              |               |         | GreenDot Business Record (Jimenez and Serrano)<br>Records  |  |
| 47.   |          |              |               |         | Block/ Cash App for Jaime Serrano  |  |
| 48.   |          |              |               |         | Serrano Call Detail Records June 29, 2019 – March 24, 2023 (914) 536-0429  |  |
| 49.   |          |              |               |         | American Airlines (Jimenez)  |  |
| 50a.-b.   |          |              |               |         | Flight Records and Manifest  |  |
| 51a.<br>51b.<br>51c.<br>51d.<br>51e.            |          |              |               |         | Enterprise Rental Records (Internal) Enterprise<br>Rental Summary<br>Enterprise Itemized Receipt of Toll Hits<br>Enterprise Rental Records (Internal and License<br>Plate Information)<br>Enterprise Nissan Versa Maintenance  |  |
| 52.   |          |              |               |         | Serrano FDC Miami TRULINCS Email   |  |
| 53.   |          |              |               |         | RAMIREZ iCloud<br>Subscriber page Apple ID: Roly@doralcollision<br>Tadeo Text Messages 2012<br>Tadeo Text Messages 2013<br>Tadeo Text Messages 2014<br>Fonseca Text Thread 2012<br>Fonseca Text Messages 2014<br>Lianko Text Messages 2019<br>Bernreuther Text Messages 2019<br>Jukel Text Messages 2019<br>ALI Text Messages 2019 |  |



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|   |          |              |               |         | ALI Text Messages 2020<br>Attribution  |  |
| 54.   |          |              |               |         | ALI iCloud ("Big Sheed")<br>Subscriber page<br>"Greenlight" (Serrano) Text Messages 2019<br>"Clay Helton" (Swaby) Text Messages 2019<br>"Fernando Clay" (Carias) Text Messages 2019<br>"Omar Autobody" Text Messages 2019<br>"Lex Food Dude" (Berbick) Text Messages<br>"Shifta" (MASON) Text Messages 2021<br>"Greenlight" (Serrano) WhatsApp Messages 2016<br>"Greenlight" (Serrano) WhatsApp Messages 2020-2022<br>"Shifta" (MASON) Phone ending 3727<br>WhatsApp Messages 12/19/2017 – 10/11/2022<br>"Shifta" (MASON) Phone ending 7107<br>WhatsApp Calls 11/2022<br>Attribution |  |
| 55.<br>55a.-<br>55dd.                           |          |              |               |         | ALI Burner Phone ending 8851<br>Photographs and Images   |  |
| 56.<br>56a.-f.                                  |          |              |               |         | ALI Phone ending in 9346<br>Call logs<br>Photographs and videos (marijuana)<br>Signal® Messages with "johnwickja279"<br>(MASON) Phone ending in 5535<br>WhatsApp messages ("Jelin Vargas")<br>Google Search<br>Attribution   |  |
| 57.   |          |              |               |         | MASON iCloud ("johnwick275921", "Shifta Mason",<br>fraskreqmusic")<br>Subscriber page (Including 3727 and 7107)<br>"Raga" (Serrano) Phone ending 3357 messages with<br>MASON Phone ending 1298<br>Photograph of MDPD Det. Hendrick's business card<br>Records of ledgers and shipments<br>Photographs of Signal® messages with ledgers 08/2020<br>Photograph of WhatsApp message with "Greenlight"<br>with ledger 08/2020  |  |

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|   |          |              |               |         | Photographs of documents related to trucking company<br>Photograph of One Trucking Company<br>Attribution  |  |
| 58a.<br>58b.                                    |          |              |               |         | MASON Phone (Seized April 1, 2023) Subscriber Page<br>WhatsApp messages with "GI" with phone number 347-419-0946 (Serrano) 10/14/2021-08/06/2022               |  |
| 59.<br>59a.                                     |          |              |               |         | MASON phone ending in 5535 Subscriber Page<br>Call logs<br>Videos and Photographs(marijuana)<br>Signal® messages with "Sk" ALI Phone ending in 9346            |  |
| 60a.<br>60b.                                    |          |              |               |         | Serrano Flip Phone Call logs<br>Serrano Text messages with MASON Phone ending 1298   |  |
| 61.   |          |              |               |         | Serrano Infinity Purchase Sept. 1, 2019  |  |
| 62.   |          |              |               |         | Lyft   |  |
| 63a.<br>63b.                                    |          |              |               |         | Business Record Certification for Telephone/<br>Call Detail and Location Data/Jaime Serrano Call Detail<br>Records Subscriber Information                      |  |
| 64a.<br>64b.                                    |          |              |               |         | ALI "TD Bank" Business Record Certificate<br>Church Rent Deposit   |  |
| 65.   |          |              |               |         | Instagram/ Jaime Serrano<br>Floral Shirt Photograph<br>Driveway with cars various  |  |
| 66.   |          |              |               |         | Serrano iCloud<br>Photographs  |  |
| 67.   |          |              |               |         | Serrano TD Bank Account 8119   |  |
| 68.   |          |              |               |         | Business Record Certification for Telephone/ Call /<br>Detail and Location Data Julian Jimenez<br>Call Detail Records<br>Subscriber Information<br>LTE Records |  |
| 69.   |          |              |               |         | Business Record Cert for Telephone/Call/Detail<br>and Location Data for MASON 3727 (7/27/20-9/30/20)<br>Business Record Cert for Telephone/Call/Detail Records |  |

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|   |          |              |               |         | for MASON 3727 (1/1/22-1/10/23)  |  |
|   |          |              |               |         | Business Record Cert for Telephone/Call/Detail and Location Data for MASON 3727 (8/10/22-3/27/23)            |  |
| 70.   |          |              |               |         | Business Record Cert for Telephone/Call/Detail and Location Data for MASON 7107 (10/11/22-3/28/23)           |  |
|   |          |              |               |         | Business Record Certificate for Telephone/Call/Detail Records for MASON 7107 (1/1/19-1/4/23)                 |  |
| 71.   |          |              |               |         | Business Record Certificate for Telephone/Call/Detail Data for MASON 1298 (9/1/23-1/15/24)                   |  |
|   |          |              |               |         | Business Record Certificate for Telephone/Call/Detail Records for MASON 1298 (8/1/19-9/21/23)                |  |
| 72a.<br>72b.                                    |          |              |               |         | Business Record Certificate Telephone/Call/Detail Data for MASON 8801 (9/1/23-1/15/24)                       |  |
| 73.   |          |              |               |         | Business Record Certificate for Telephone/Call/Detail and Location Data for ALI 5702 (8/1/19-9/9/19)         |  |
|   |          |              |               |         | Call Detail Records  |  |
|   |          |              |               |         | Business Record Cert for Telephone/Call/Detail for ALI 5702 (1/1/22-1/10/23)                                 |  |
|   |          |              |               |         | Business Record Cert for Telephone/Call/Detail and Location Data for ALI 5702 (8/10/22-1/6/23)               |  |
|   |          |              |               |         | Business Record Cert for Telephone/Call/Detail and Location Data for ALI 5702 (1/6/23-3/7/23)                |  |
| 74a.  |          |              |               |         | Verizon Subscriber Information for ALI TracFone ending in 3675, 9490, 6490 found in ALI's Aventura Residence |  |
| 74b.  |          |              |               |         | TracFone Subscriber Information for ALI TracFone ending in 3675 found in ALI's Aventura Residence            |  |
| 74c.  |          |              |               |         | TracFone Subscriber Information for ALI TracFone ending in 9490 found in ALI's Aventura Residence            |  |

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| 74d.  |          |              |               |         | TracFone Subscriber Information for ALI TracFone ending in 6490 found in ALI's Aventura Residence  |  |
| 75a.  |          |              |               |         | Business Record Cert for Telephone/Call/Detail and Location Data for RAMIREZ 2449 (2/1/19-3/1/19) and Telephone/Call/Detail and Location Data for RAMIREZ 2449 (8/1/19-9/9/19) |  |
| 75b.  |          |              |               |         | Business Record Cert for Telephone/Call/Detail for RAMIREZ 2449 (3/1/19-8/16/24)   |  |
| 75c.  |          |              |               |         | Business Record Certificate for Telephone/Call/Detail and Location Data for RAMIREZ 2449 (8/10/22-3/27/23)   |  |
| 76a.  |          |              |               |         | Ali Grand Jury Subpoena  |  |
| 76b.  |          |              |               |         | Ali Grand Jury Subpoena Answer   |  |
| 77a.  |          |              |               |         | Business Record Certification Bank/ TD Bank  |  |
| 77b.  |          |              |               |         | Alexandra Owens  |  |
| 77c.  |          |              |               |         | \$1100 Deposit   |  |
| 77d.  |          |              |               |         | Statement page showing \$1100 deposit  |  |
|   |          |              |               |         | Statement page with transfer to ALI  |  |
| 78a.  |          |              |               |         | Wendy's Business Record Certificate  |  |
| 78b.  |          |              |               |         | Wendy's receipt  |  |
| 79a.  |          |              |               |         | Pollo Tropical Business Record Certificate   |  |
| 79b.  |          |              |               |         | Pollo Tropical receipt   |  |
| 80.   |          |              |               |         | Federal Detention Center Jaime Serrano housing   |  |
| 81a-j.  |          |              |               |         | Doral Collision v. Alex Vega<br>RAMIREZ Deposition   |  |
| 82a.-e.   |          |              |               |         | ALI Phone (Seized in 2023) ending in 5702 screen recordings  |  |
| 83.   |          |              |               |         | Summary Exhibit  |  |

| Presiding Judge:<br>The Honorable Roy K. Altman |          |              |               |         | AUSAs:<br>Abbie D. Waxman and<br>Michael Gilfarb  | Defendants' Attorneys:<br>Philip Reizenstein<br>Eric Schwartzreich<br>Richard Merlino<br>Dustin Tischler |
|---|----------|--------------|---------------|---------|---|--|
| USA No.   | Def. No. | Date Offered | Date admitted | Witness | Court Reporter:<br>Francine Salopek   | Courtroom Deputy:<br>Janier Arellano   |
| 84.   |          |              |               |         | C.A.S.T. Analysis Report  |  |
| 85.   |          |              |               |         | Business Record Cert for Telephone/Call/Detail for Yalene Marissa Gonzalez 9544 (01/01/2022-01/10/2023)<br><br>Telephone/Call/Detail and Location Data for Yalene Marissa Gonzalez 9544 (08/10/2022-03/27/2023) |  |
| 86.   |          |              |               |         | Business Record Cert for Telephone/Call/Detail Records and corresponding records for Alexandra Owens 8594 (01/01/2019-08/24/2022)   |  |
| 87.   |          |              |               |         | RAMIREZ text messages from telephone 2449 with ALI telephone 5702   |  |
| 88.   |          |              |               |         | Jaime Serrano DNA Swab  |  |
| 89.   |          |              |               |         | 2015 New York Burglary Report   |  |
| 90.   |          |              |               |         | RAMIREZ Residence Search (March 2023)   |  |
| 91.   |          |              |               |         | ALI 2024 Phone ending in 5702   |  |
| 92.   |          |              |               |         | Racket Absence of Nore/Timeless Promotion   |  |
| 93.   |          |              |               |         | Foreign Religion Screenshot   |  |
| 94.   |          |              |               |         | Stipulations  |  |
| 95.   |          |              |               |         |   |  |
| 96.   |          |              |               |         |   |  |

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 29, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/Abbie D. Waxman  
Assistant United States Attorney